

**To:** Laidlaw, Tina[Laidlaw.Tina@epa.gov]  
**Cc:** McInnis, Amanda[Amanda.McInnis@hdrinc.com]; Suplee, Mike[msuplee@mt.gov]  
**From:** Mumford, David  
**Sent:** Wed 5/29/2013 9:01:10 PM  
**Subject:** RE: A few follow-up questions/ comments

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>>>  
Hi Tina

My proposal was for the following:

2016 – TN 10 mg/L & TP 1mg/L

Permit #1- TN 8 mg/L & TP .8 mg/L

Permit #2 – TN 6 mg/L & TP .6mg/L

I will discuss with MLCT the option of having a TP .1 mg/L in Permit #2. This would require all large dischargers to make significant improvements to their phosphorous processes. Looking at research for the Yellowstone, it appears the receiving water is phosphorous limited and the lower TP would make the most improvements. What if the lower TP .1 mg/L be required by the end of the permit time? This may provide relief in developing plant improvements.

Talking to Shari Johnson who is taking on the task for the MLCT of talking to the < 1mgd communities, she is of the opinion that they should be held to the same requirements as the > 1 mgd communities.

Dave

**From:** Laidlaw, Tina [mailto:Laidlaw.Tina@epa.gov]  
**Sent:** Wednesday, May 29, 2013 10:51 AM  
**To:** Mumford, David  
**Cc:** McInnis, Amanda; Suplee, Mike  
**Subject:** A few follow-up questions/ comments

Dave, by the end of the permit

I wanted to touch base with you to make sure I've got the number correct for the various interim limits. When I looked at my meeting notes, I think you said that the permits would be 1 mg/L TP; 10 mg/L TN until 2016; next permit cycle would be 0.08 mg/L TP and 8 mg/L TN; and last permit cycle would be 0.06 mg/L and 6 mg/L TN. Are those the correct numbers? Part of the reason why I'm asking is that the TP numbers are much higher than the ones proposed in the original memo (i.e., 0.6 mg/L TP compared to 0.1 mg/L). Is the League open to lowering the TP limits to 0.1 mg/L for the second permit cycle? Lower TP numbers would be helpful as I share this concept with HQs folks. Just a thought.

Also, I think there was a question about whether individual variances would still be available to facilities >1MGD if the interim limits were identified in the rule package. From EPA's

perspective, individual variances are still an option if a facility can demonstrate that they cannot achieve the proposed interim limits for reasons identified in the flow chart / draft rules (e.g., economics, focus on one nutrient, etc.). Hopefully that lends support to the League's approach to defining the interim limits in rule since there is still flexibility to pursue individual variances if needed.

Look forward to hearing from you.

Tina